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GUILFORD F. THORNTON, JR.  
gthornton@stokesbartholomew.com

June 13, 2003

The Honorable Sara Kyle, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

RE: Complaint of Ben Lomand Communications, Inc. Against  
Citizens Telecommunications Company of Tennessee, Inc. d/b/a Frontier  
Communications of Tennessee

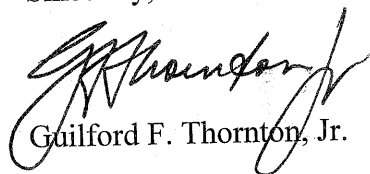
Docket No. 02-01221

Dear Chairman Kyle:

Pursuant to the procedural schedule adopted at the status conference conducted by Randall Gilliam in this matter on June 3, 2003, I am enclosing on behalf of Citizens Telecommunications Company of Tennessee, LLC additional responses to discovery requests previously tendered by counsel for Ben Lomand Communications, Inc. ("BLC"). A copy has been served on counsel for BLC.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,



Guilford F. Thornton, Jr.

cc: Mike Swatts  
Gregg Sayre

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**COMPLAINT OF BEN LOMAND  
COMMUNICATIONS, INC.,**

**Against**

**CITIZENS TELECOMMUNICATIONS  
COMPANY OF TENNESSEE, LLC,  
d/b/a FRONTIER COMMUNICATIONS  
OF TENNESSEE.**

**Docket No. 02-01221**

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**ADDITIONAL PROPRIETARY AND CONFIDENTIAL SUPPLEMENTAL RESPONSE  
OF CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE, LLC TO  
DISCOVERY REQUESTS OF BEN LOMAND COMMUNICATIONS, INC.**

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Citizens Communications Company of Tennessee, LLC ("Citizens") herein responds further to Ben Lomand Communications, Inc.'s ("Ben Lomand's") first set of discovery requests. Subject to and reserving objections as set forth in its first response, Citizens attaches hereto the prior production of proprietary and confidential information with the following references to specific Interrogatories and Data Requests from Ben Lomand Communications, Inc.

**Exhibit 1**, attached, responds to Interrogatories 2, 3 and 4, and Data Request 4.

**Exhibit 2**, attached, responds to Interrogatory 6.

**Exhibit 3**, attached, responds to Data Request 1.

**Exhibits 4, 12, 14 and 15**, attached, respond to Interrogatories 6, 7 and 8, and Data Requests 12 and 13.

**Exhibits 5 and 6**, attached, respond to Data Requests 12 and 13.

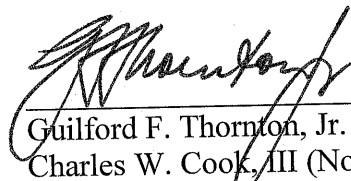
**Exhibits 7 and 8**, attached, respond to Interrogatory 6 and Data Requests 12 and 13.

**Exhibits 9, 10 and 13**, attached, respond to Data Requests 12 and 13.

**Exhibit 11**, attached, responds to data Request 5.

All responses are Confidential and Proprietary under the protective order issued in this matter.

Respectfully submitted,



Guilford F. Thornton, Jr. (No. 14508)

Charles W. Cook, III (No. 14274)

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Nashville, Tennessee 37219

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*Attorneys for Citizens Communications*

*Company of Tennessee, d/b/a Frontier*

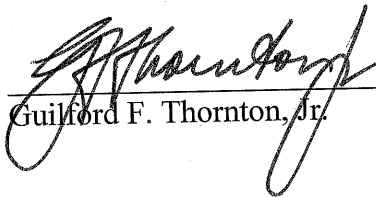
*Communications of Tennessee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 13<sup>nd</sup> day of June, 2003, a true and exact copy of the foregoing was forwarded via hand delivery or U.S. Mail to the following:

H. LaDon Baltimore  
Farrar & Bates, LLP  
211 7<sup>th</sup> Avenue North, Suite 420  
Nashville, TN 37219

Randall Gilliam  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238



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Guilford F. Thornton, Jr.